

PR 92-289

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26 December 1991
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DEC 27 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Secretary
Federal Communications Commission
Washington, D.C. 20554

ORIGINAL
FILE

Dear Mr. Secretary

Please accept my comments in the matter of both RM-7868 and
RM-7869.

Respectfully,



Thomas J. Kirby

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Part 97 of the)
Commission's Rules Governing the)
Amateur Radio Services Regarding)
Expansion of the Novice Sub-Band)
in the 1.25 Meter Band)

RM-7868

COMMENTS UPON THE PETITION FOR RULE MAKING

INTRODUCTION

I, THOMAS J. KIRBY respectfully submit to the commission my comments upon the petition of the American Radio Relay League, (the ARRL), for the expansion of the sub-band available to Novice class operators in the 222 to 225 MHz amateur band.

I am a licensed amateur operator holding Extra Class license and station W1EJ. I have been licensed since 1955 in the amateur service and have operated within the amateur 1.25 meter band during all of the thirty-six years since that time.

I am educated to the "Engineer" level in Electrical Engineering and hold four patents for advances in communications technology. I am a registered Professional Engineer in Massachusetts and Maine.

DISCUSSION

I wish to state here my complete support for the petition by the ARRL in this matter. The Novice operator is well suited by training and experience to participate in activities across the entire 222.000 to 225.000 MHz band.

The Novice class candidate must demonstrate a facility in the use of the international Morse code at five words per minute in testing for his license. Amateur practice, illustrated in the 222 MHz bandplan in use in North America, prioritizes the use of CW in the 1.25 meter band to the sub-band from 222.000 to 222.100 MHz. The Novice operator cannot easily participate in this activity today as Novice operation in the band below 222.100 MHz is prohibited.

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Novice operation in this segment would increase the geographic distribution of active amateurs at any given time on the band. This will serve to alert the amateur community to the presence of localized anomalous propagation conditions enhancing the operating experience for all participants. Opening the 222.000 to 222.100 MHz sub-band to Novices will enhance the band for all participants.

In the higher regions of the band digital operations are burgeoning today in the sub-band from 223.500 to 224.000 MHz. Thus the band is in a state of rapid flux due to the recent allocation contraction. The Novice operator should be permitted to fully participate in the digital development now ongoing. For this reason the band to 224.000 MHz should be available to him.

Above 224.000 MHz the main usage is for repeater outputs. However some simplex operations does occur on output frequencies when the repeater is not in use. It would be useful to permit the Novice operator access to this activity.

SUMMARY

I encourage the commission to enhance the amateur service by providing full access from 222.000 to 225.000 MHz to the Novice operator.

Respectfully,



Thomas J. Kirby P.E. W1EJ